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8 Attorneys for Plaintiff

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) CR No. 07-0454 PJH
14 Plaintiff,)
15 v.) STIPULATION AND [PROPOSED] ORDER
16 SHANNON BLAYLOCK,) EXCLUDING TIME FROM JANUARY 23,
aka ARLANDYS RICHARDSON,) 2008 THROUGH FEBRUARY 20, 2008
aka "DADDY RICH",)
17 TAWAKONI SEATON,)
aka TONI,)
18 Defendants.)
19
20 _____)
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22 On January 23, 2008, the parties in this case appeared before the Court. Counsel for the
23 United States and counsel for co-defendants Blaylock and Seaton stipulated that the case is a
24 complex case under 18 U.S.C. § 3161(h)(8)(B)(ii). These parties also stipulated that time should
25 be excluded from the Speedy Trial Act calculations from January 23, 2008 through February 20,
26 2008. These parties represented that granting the continuance was necessary for effective
27 preparation of counsel, taking into account the exercise of due diligence, to afford counsel time
28 to review discovery. See 18 U.S.C. § 3161(h)(8)(B)(iv). Counsel for co-defendant Gardner

STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME, 07-0454 PJH

1 objected to the exclusion of time on all grounds.

2 SO STIPULATED:

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4 JOSEPH P. RUSSONIELLO
United States Attorney

5
6 DATED: April 30, 2008

/s/ Denise Barton
DENISE MARIE BARTON
Assistant United States Attorney

7
8 DATED: April 30, 2008

/s/
MICHAEL STEPANIAN
Attorney for SHANNON BLAYLOCK

9
10 DATED: April 30, 2008

/s/
KENNETH WINE
Attorney for TAWAKONI SEATON

11
12 [Proposed] Order

13 As the Court found on January 23, 2008 and for the reasons stated above, the Court finds that
14 the ends of justice served by the continuance outweigh the best interests of the public and the
15 defendants in a speedy trial and that time should be excluded from the Speedy Trial Act
16 calculations from January 23, 2008 through February 20, 2008 for effective preparation of
17 counsel and due to the complexity of the case. See 18 U.S.C. §3161 (h)(8)(A). The failure to
18 grant the requested continuance would deny counsel reasonable time necessary for effective
19 preparation of counsel, taking into account the exercise of due diligence, and would result in a
20 miscarriage of justice. See 18 U.S.C. §3161(h)(8)(B)(iv).

21
22 SO ORDERED.

23
24 DATED: _____

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26 HONORABLE. PHYLLIS J. HAMILTON
United States District Judge